

August 21, 2002

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., SW, CY-B402
Washington, DC 20554

**RE: WC Docket No: 02-214 - Application by Verizon Corporation
for Authorization Under Section 271 to Provide Long Distance
Service In the State of Virginia**

Dear Ms. Dortch:

The Community Action Partnership (CAP) strongly encourages the Federal Communications Commission (FCC) to grant approval of Verizon's application to provide long-distance service to consumers in Virginia. Verizon's application is in the public interest and of real benefit to telecommunications consumers in the state of Virginia. CAP serves as a national forum for policy on poverty and to strengthen, promote, represent and serve its network of member agencies to assure that the issues of the poor are effectively heard and addressed. CAP advances the economic condition, educational attainment, political influence, health and civil rights of low-income Americans through community-based programs operating at more than 900 Community Action Agencies (CAAs) nationwide. It is CAP's mission to ensure that low-income Americans are not left behind.

In states where Verizon has been approved to provide long distance services, they have introduced simpler and less expensive plans than most other carriers and launched innovative packages. For example, in New York, Verizon has introduced several calling plans with rates as low as 5 cents a minute during off-peak hours as well as plans with no minimum charges.

Verizon has demonstrated its commitment to serve its residential consumers' unique needs by introducing affordable international rates for calls to the Caribbean, which has proved to be especially popular. In addition, Verizon has extended off peak hours by an additional three hours (from 5 p.m. to 8 a.m. instead of the usual 7 p.m. to 7 a.m.). This allows consumers to make more calls during times that make sense for them.

Verizon has a record of introducing affordable, competitive and innovative plans that have been particularly attractive to low-volume customers who most long distance companies find unattractive. CAP is especially pleased that Verizon offers low-cost plans with no monthly fees or minimum usage fees for low volume users. Verizon calling plans are unlike other long distance companies' plans that charge customers higher "basic" rates if they do not enroll in a more compatible calling plan. Verizon's entrance into the long distance market will be good for consumers, bringing affordable long distance rates for residents of Virginia.

While increased competition is one of our primary concerns, CAP also recognizes the importance of other telecommunications services, such as access to the Internet. CAP believes that allowing Verizon to enter the long distance market, providers of advanced telecommunications services will increase consumer choice and decrease costs of these services. Many consumers today have access to toll-free Internet dial up services as well as high-speed Internet access. However, too many consumers are still waiting for reliable, toll-free Internet access in their area. Consumers that are without toll-free Internet access are forced to incur long-distance charges for the time they spend online, in addition to their Internet service provider service charges.

Low-income communities in Virginia require greater competition in the long distance market. CAP urges the Federal Communications Commission to accept Verizon's application to ensure that consumers reap the benefit of increased competition.

Respectfully submitted,

//s//

Derrick Span
Executive Director
Community Action Partnership
1100 17th Street Suite 500
Washington, DC 20036